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Re: In re Lehman Brothers Holding Inc. Case No. 08-13555

Plan Administrator's File Completeness Assessment

Counsel,

The Plan Administrator is in receipt of the Notice of RMBS Claim File Submission, dated June 29, 2015, for which the images for the Claim Files were received June 30, 2015, containing 5,128 loans with a total Purchase Price of \$1,262,333,602.55, sent on behalf of the RMBS Trustees per the Court's December 29, 2014 order (ECF 47569) (the "Order"). Capitalized terms used but not defined herein shall have the meanings given to them in the Order.

In accordance with Section IV(a) of the RMBS Claim Protocol, the Plan Administrator has completed its review of the 5,128 files and determined the following:

1. 1,888 of the 5,128 files are Complete Files per the attached spreadsheet loan listing ("Spreadsheet"), and the Plan Administrator's review of the Complete Files will begin according to Section IV(b) of the Order.
2. 310 of the 5,128 files are incomplete files because they are missing documents in the Mortgage Loan File, as noted in the Spreadsheet. Despite this deficiency, the Plan Administrator will begin its review of these 310 incomplete files because the Mortgage

Loan File does not appear to be missing the corporate expense log, the payment history log and the servicing notes ("Critical Documents") for loans reported as active by the RMBS Trustees ("Active Loans"); the Mortgage Loan File also does not appear to be missing the Critical Documents and the calculation of the Purchase Price, including all supporting documents, as required per Section III(e)(vi)(4) of the Order for the loans reported as liquidated by the RMBS Trustees ("Liquidated Loans"). The foregoing review, however, shall not consist of a waiver of the Plan Administrator's rights pursuant to Section IV(a) of the Order with respect to these 310 incomplete files. Indeed, this shall serve as notice that the Plan Administrator is not able to certify completeness of these 310 incomplete files per Section IV(a) of the Order. Moreover, should the Plan Administrator determine that these 310 incomplete files cannot be fully reviewed because they are missing the Critical Documents for Active Loans, or cannot be fully reviewed because they are missing the Critical Documents and the calculation of the Purchase Price for Liquidated Loans, the Plan Administrator shall halt its review of these incomplete files until the RMBS Trustees provide the Critical Documents.

3. 1,297 of the 5,128 files are incomplete files for which the Mortgage Loan File is missing Critical Documents, as noted in the Spreadsheet. In accordance with Section IV(a) of the Order, the Plan Administrator hereby provides notice that it is unable to begin its review of these 1,297 incomplete files due to lack of completeness. Once the missing Critical Documents are provided, the Plan Administrator shall re-asses the completeness of these 1,297 incomplete files.
4. 1,633 of the 5,128 files are incomplete files that are missing the calculation of the Purchase Price, including all supporting documents, as required per Section III(e)(vi)(4) of the Order. As noted in the Spreadsheet, 1,341 of these 1,633 incomplete files are also missing Critical Documents. This shall therefore serve as notice that the Plan Administrator is not able to certify the completeness of these 1,633 incomplete files per Section IV(a) of the Order. For purposes of efficiency and continued collaboration between the parties, however, the Plan Administrator intends to work with the RMBS Trustees' advisors, Duff & Phelps, in order to try to work through these incomplete files and reach an acceptable level of file completeness. The Plan Administrator shall re-asses the completeness of these 1,633 incomplete files on an ongoing basis.

Sincerely,



Todd G. Cosenza

Attachment